

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CUREN ESSEX, ALICIA BULKO,
SUSAN COOK, ELIZABETH ZUBOR,
and SUSAN TERRELL,

Plaintiffs,

Case No.: 09-11095

Hon.: ARTHUR J. TARNOW

vs.

LIVINGSTON COUNTY, a
municipal corporation, ROBERT
BEZOTTE in his individual capacity
as the Livingston County Sheriff, TOM
CREMONTE in his individual capacity as
the Livingston County Jail Administrator, and
RANDY BOOS in his individual capacity,
Jointly and Severally,

Defendants.

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**MOTION TO COMPEL ANSWERS TO
INTERROGATORIES AND FOR COSTS**

Now comes the Defendant, RANDY BOOS, by and through his attorney, Thomas A.

Matthews and pray that this Honorable Court issue an Order Compelling Plaintiff, SUSAN TERRELL to answer Interrogatories previously served upon her, and to further award to said Defendant costs, including a reasonable attorney fee, incurred in the filing and hearing of this Motion, and dhow unto this Court as follows:

1. That pursuant to Fed. R. Civ. P. 33 Interrogatories were served upon the Plaintiff on August 3, 2010, as appears from the Proof of Service affixed to said Interrogatories. Copy of said Proof of Service is attached hereto as Exhibits A and incorporated herein by reference.
2. That the time for answering such Interrogatories as provided by Fed. R. Civ. P. 33 has expired.
3. That the Plaintiff has not filed objections to said Interrogatories, requested a Protective Order, or filed a Motion for extension of time to answer said Interrogatories.
4. That the Plaintiff has refused and/or neglected to answer such Interrogatories and is subject to the consequences for refusing to make discovery, as provided in Fed. R. Civ. P. 37 and its subdivisions.

WHEREFORE, Defendant, Randy Boos pray that an Order be entered compelling Plaintiff to answer Defendant's Interrogatories, under such terms and conditions as the Court shall order, and further, that this Honorable Court award to said Defendant, costs including a reasonable attorney fee, incurred in the filing and hearing of this Motion.

Dated: November 23, 2010

/s/ Thomas A. Matthews
Thomas A. Matthews, (P-28414)
Attorney for Defendant, Randy Boos

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SUSAN TERRELL,

Plaintiff,

Case No.: 2:10-cv-11177-ADT-MKM

Hon.: ARTHUR J. TARNOW

vs.

LIVINGSTON COUNTY, a
municipal corporation, ROBERT
BEZOTTE in his individual capacity
as the Livingston County Sheriff, TOM
CREMONTE in his individual capacity as
the Livingston County Jail Administrator, and
RANDY BOOS in his individual capacity as Deputy
Sheriff, Jointly and Severally with one another

Defendants.

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PROOF OF SERVICE

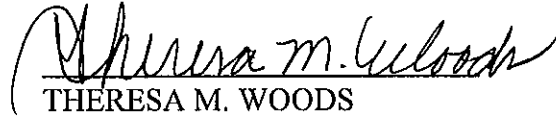
THERESA M. WOODS, of 2000 Grand River Annex, Ste. 200, Brighton, Michigan 48114, states that on the 3rd day of August, 2010, she served Defendant, Randy Boos' First Interrogatories to Plaintiff, Susan Terrell and Notice of Taking Deposition upon Plaintiff's Attorney by depositing said document(s) in an envelope sealed, with first class postage fully prepaid thereon, and by depositing said envelope in a United States post office box in Brighton, Michigan, plainly addressed

to:

Donald J. Cataldo
519 E. Grand River Avenue
Lansing, Michigan 48906

T. Joseph Seward
33900 Schoolcraft
Livonia, Michigan 48150

Dated: August 3, 2010


THERESA M. WOODS